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9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 RAMON DESAGE, aka RAMON ABI-
15 RACHED, aka RAYMOND ANTOINE
ABI-RACHED,

16 Defendant.

2:13-CR-039-JAD-VCF

**William Richardson's and Harvey
Vechery's Unopposed Motion to Extend
Time to File their Replies to the
Government's Responses to the
Richardson's and Vechery's Motions to
Intervene (ECF No. 349, 361)
(First Request)**

17 This Motion to Extend Time is the first request. LR IA 6-1.

18 William Richardson (Richardson) and Harvey Vechery (Vechery) respectfully move
19 this Court for an Order extending the time for Richardson and Vechery to file their
20 respective Replies to the government's Responses (ECF Nos. 372, 373) to Richardson's and
21 Vechery's Motions to Intervene (ECF Nos. 349, 361). The reason is the government,
22 Richardson, and Vechery will attempt to settle numerous issues in the civil forfeiture in rem
23 action, and if those issues can be resolved in the in rem action, will dismiss motions to
24 intervene, the motion for return of property, and the government's Response. However, this
25 resolution in the criminal and civil in rem action needs time to resolve numerous legal issues
26 before entering into a settlement agreement among Richardson, Vechery, and the
27 government, which will require approval or non-approval by the Chief of Money
28 Laundering and Asset Recovery Section Criminal Division, United States Department of

1 Justice. Certain things must take place before the settlement agreement among the
2 government, Richardson, and Vechery can occur. The parties hope it will take less than 4
3 months but cannot make any promises until the other things take place. Richardson and
4 Vechery request an extension to, and including, April 20, 2020.

5 On December 18, 2019, the government consented to the extension of time at the
6 request of David Chesnoff, counsel for William Richardson. On December 23, 2019, the
7 government consented to the extension of time at the request of Patricia Lee.

8 This Motion is not submitted solely for the purpose of delay or for any other
9 improper purpose.

10 This Court should grant an extension of time to, and including, April 20, 2020.

11 DATED: December 23, 2019.

12 NICHOLAS A. TRUTANICH
13 United States Attorney

14 /s/ Daniel D. Hollingsworth
15 DANIEL D. HOLLINGSWORTH
16 Assistant United States Attorney

17 IT IS SO ORDERED:
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19 
20 HONORABLE JENNIFER A. DORSEY
21 UNITED STATES DISTRICT JUDGE

22 DATED: 12/27/2019
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